

EXHIBIT 4

IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL
CIRCUIT IN AND FOR BROWARD COUNTY, FLORIDA

CASE NO.: CACE 15-000072

BRADLEY J. EDWARDS and PAUL G.
CASSELL,

Plaintiffs,

vs.

ALAN M. DERSHOWITZ,

Defendant.

_____ /

VIDEOTAPE CONTINUED DEPOSITION OF

ALAN M. DERSHOWITZ

VOLUME 4

Pages 462 through 647

Tuesday, January 12, 2016

1:05 p.m. - 4:45 p.m.

Tripp Scott

110 Southeast 6th Street

Fort Lauderdale, Florida

Stenographically Reported By:
Kimberly Fontalvo, RPR, CLR
Realtime Systems Administrator

1 Virginia Roberts and things that she has said, was
2 she lying when she said that she has flown on
3 Jeffrey Epstein's airplane?

4 MR. INDYKE: Objection. Work product and
5 common interest.

6 A. I think I can answer that question. Based
7 on material that was produced in discovery, which
8 would not be subject to privilege, there seems to be
9 evidence that she did fly on the airplane with
10 Jeffrey Epstein.

11 BY MR. EDWARDS:

12 Q. Was she lying when she says that she was
13 flown on Jeffrey Epstein's airplane across state
14 lines at a time when she was under the age of 18?

15 A. I have no idea.

16 MR. INDYKE: Objection. Same objection.
17 Work product and attorney-client and common
18 interest.

19 A. I have no idea. But, again -- I just have
20 no idea.

21 BY MR. EDWARDS:

22 Q. Is there any nonprivileged information
23 that you could review that would give you an idea to
24 answer that question or that would give you the
25 answer to that question?

1 BY MR. EDWARDS:

2 Q. What we have here --

3 MR. INDYKE: Attorney-client, work product
4 and common interests.

5 BY MR. EDWARDS:

6 Q. What we have here is only the fraction of
7 flights where Dave Rogers was one of the pilots.

8 Can you help us get the flight logs from Larry
9 Visosky, Larry Morrison, any of the flight logs from
10 the helicopters, et cetera?

11 A. I would love to. It would all show that I
12 wasn't on the plane.

13 MR. INDYKE: Same objection, same
14 instruction.

15 A. I will do everything in my power --

16 MR. SCOTT: You can make any request you
17 want to through counsel, and we'll take them
18 up.

19 A. But I will do everything in my power to
20 get you every flight manifest.

21 SPECIAL MASTER POZZUOLI: Move forward.

22 MR. INDYKE: We do not waive any
23 objection.

24 MR. SCAROLA: And that request has been
25 made.

1 A. Is that a question?

2 MR. SCOTT: No. Just Mr. Scarola --

3 MR. EDWARDS: Just that we made a request
4 for production.

5 BY MR. EDWARDS:

6 Q. Was Virginia lying when she says that she
7 was taken to Jeffrey Epstein's home in New York
8 while underage?

9 A. I have no idea.

10 MR. INDYKE: Same objection, same
11 instruction.

12 BY MR. EDWARDS:

13 Q. Was Virginia lying when she says she was
14 taken to Jeffrey Epstein's ranch in New Mexico while
15 underage?

16 MR. INDYKE: Same objection, same
17 instruction.

18 A. I can tell you this. She's lying when she
19 said she met me at the ranch. So I cannot believe
20 anything she says about the ranch.

21 BY MR. EDWARDS:

22 Q. Was she lying when she says Ghislaine
23 Maxwell and Jeffrey Epstein used sex toys on her
24 when she was underage?

25 MR. INDYKE: Same objection, same

1 instruction.

2 BY MR. EDWARDS:

3 Q. Was she lying when she says Jeffrey
4 Epstein and Ghislaine Maxwell made her dress up in
5 outfits for them?

6 MR. INDYKE: Same objection, same
7 instruction.

8 A. Well, I can -- but I do have some material
9 outside of the record on that.

10 BY MR. EDWARDS:

11 Q. Okay.

12 A. I know that Sigrid McCawley said that she
13 said that Leslie Wexner made her dress up --

14 MS. MCCAWLEY: I am going to object to the
15 extent that you are trying to reveal
16 conversations that were part of a settlement
17 discussion which the judge has already sealed
18 the record on and there is a pending motion for
19 sanctions. And if you're going to start
20 revealing that information, we're going
21 directly to the Judge Lynch.

22 A. I am going to start revealing --

23 SPECIAL MASTER POZZUOLI: No, I'm going to
24 stop you --

25 THE WITNESS: Let me tell you why.

1 Because I didn't get that from Sigrid or from
2 David Boise. I got it from Leslie Wexner's
3 lawyer in a totally nonprivileged
4 communication.

5 SPECIAL MASTER POZZUOLI: Let me stop you.
6 I don't believe it's responsive to the question
7 that's pending, so let's move forward.

8 BY MR. EDWARDS:

9 Q. My question was, was she lying -- was
10 Virginia Roberts lying when she says Jeffrey Epstein
11 and Ghislaine Maxwell made her dress up in outfits
12 for them?

13 A. I can only say that that allegation has
14 been made regarding Leslie Wexner as well.

15 Q. It has nothing to do with my question.

16 MR. SCAROLA: Move to strike.

17 A. Leslie Wexner's lawyer regards that as a
18 full statement and, therefore, I can only assume
19 that it's a false statement when made about someone
20 else. I think that's relevant.

21 SPECIAL MASTER POZZUOLI: So with respect
22 to the --

23 MR. EDWARDS: I'm moving to strike the
24 nonresponsive portion of that answer.

25 THE WITNESS: He opened the door.

1 SPECIAL MASTER POZZUOLI: I do believe it
2 was nonresponsive in its entirety. Move
3 forward. Go ahead.

4 BY MR. EDWARDS:

5 Q. Do you know Jean-Luc Brunel?

6 A. No.

7 Q. Have you ever met him?

8 MR. INDYKE: Same objection, same
9 instruction.

10 A. I have no memory of ever meeting a man by
11 that name.

12 BY MR. EDWARDS:

13 Q. Do you know what his role was in Jeffrey
14 Epstein's life?

15 A. No.

16 MR. INDYKE: Same objection, same
17 instruction. Mr. Dershowitz, if you would let
18 me make my objections before you respond.

19 THE WITNESS: Right.

20 BY MR. EDWARDS:

21 Q. Was Virginia Roberts lying when she said
22 Jeffrey Epstein socialized with Bill Clinton during
23 the relevant time period?

24 MR. INDYKE: Same objection, same
25 instructions.

1 A. My information is that Virginia Roberts
2 was lying when she said that she saw Bill Clinton on
3 Jeffrey Epstein's island. That's all I can comment
4 about with that. And she's lying about that. And
5 she's lying about how Bill Clinton got to the
6 island.

7 MR. EDWARDS: I move to strike the
8 Nonresponsive portion of the answer.

9 SPECIAL MASTER POZZUOLI: No, it's
10 relevant to what you asked. Move forward. I'm
11 not going to strike it.

12 BY MR. EDWARDS:

13 Q. I'm going to go back to the question until
14 I get an answer, though.

15 SPECIAL MASTER POZZUOLI: Go ahead.

16 BY MR. EDWARDS:

17 Q. That is, when Virginia Roberts said that
18 during the relevant time period, which we defined as
19 1999 through 2002 --

20 A. Let's be clear. Around August of both of
21 those years, right?

22 Q. I think August of '99 through October of
23 2002.

24 A. September, I think it is.

25 Q. Okay. Was she lying -- was Virginia

1 Roberts lying when she said Jeffrey Epstein
2 socialized with Bill Clinton during that time
3 period?

4 A. I don't know.

5 MR. INDYKE: Same objection, same
6 instruction.

7 BY MR. EDWARDS:

8 Q. And you have no nonprivileged information
9 that would provide you the answer to that?

10 A. I have nonprivileged information that
11 provides me that they socialized together at some
12 point. I don't know whether it was within that
13 timeframe at all. I know they went to Africa
14 together on a mission of goodwill, but I don't know
15 the date of that. So I can't tell you whether it
16 was in the period or outside the period. You may
17 know that; I don't.

18 Q. Well, if Jeffrey Epstein and Bill Clinton
19 associated, but only at some time period either
20 before or after the relevant time period, it would
21 immediately disprove her statement that Bill Clinton
22 and Jeffrey Epstein socialized during that time
23 period?

24 A. I don't understand that question.

25 Q. No?

1 SPECIAL MASTER POZZUOLI: I don't
2 understand the question either. If you can
3 rephrase the question, that would be helpful.

4 MR. EDWARDS: Sure.

5 BY MR. EDWARDS:

6 Q. If you -- do you know from nonprivileged
7 information whether Jeffrey Epstein and Bill Clinton
8 ever socialized?

9 A. Yes.

10 Q. Do you know the beginning -- when their
11 relationship began?

12 MR. INDYKE: Objection. Same objection,
13 same instruction.

14 SPECIAL MASTER POZZUOLI: Again, under
15 nonprivileged.

16 MR. EDWARDS: Under nonprivileged
17 information.

18 MR. SCOTT: Do you have any nonprivileged
19 information about that?

20 A. I remember having dinner at the home of
21 Caroline Kennedy and Ed Schlossberg with President
22 Clinton, and he basically asked me how Jeffrey was
23 doing, and led me to believe that he had some
24 relationship with Jeffrey. I don't remember whether
25 that dinner -- when that dinner was. I can probably

1 find out. But that would be nonprivileged.

2 BY MR. EDWARDS:

3 Q. Was he still President at the time that
4 conversation was taking place?

5 A. I don't remember.

6 Q. Have you ever been, yourself, together
7 with Jeffrey Epstein and Bill Clinton?

8 A. No.

9 Q. Have you ever talked to Jeffrey Epstein
10 about Bill Clinton?

11 MR. INDYKE: Objection. Same objection,
12 same instruction.

13 SPECIAL MASTER POZZUOLI: Nonprivileged.

14 MR. EDWARDS: Yeah, nonprivileged.

15 A. It's hard to sort out the privileged and
16 the nonprivileged.

17 SPECIAL MASTER POZZUOLI: So based upon
18 the objection, I would ask that you -- unless
19 it's obvious, then no, until we sort that out.

20 A. I shouldn't answer that probably.

21 SPECIAL MASTER POZZUOLI: I'm going to
22 grant his objection at this point, again, as a
23 continuum because I want to make sure that we
24 preserve this issue for later on.

25

1 BY MR. EDWARDS:

2 Q. In a previous -- previously in this
3 deposition, you indicated your representation of
4 Jeffrey Epstein on this subject matter began in
5 2005, right?

6 A. It began, I think I said, when the first
7 allegations were. I don't have an exact date in
8 mind.

9 Q. The relevant time period for Virginia
10 Roberts, as we've defined, is 1999 through 2002.

11 A. That's correct, yes.

12 Q. So I'm asking if you know from Jeffrey
13 Epstein, in a time period prior to your
14 representation, whether he was socializing with Bill
15 Clinton.

16 MR. INDYKE: Same objection, same
17 instruction.

18 A. Yes, yes.

19 MR. SCOTT: As long as it's a
20 nonprivileged situation.

21 A. He was.

22 BY MR. EDWARDS:

23 Q. He was?

24 A. He was.

25 Q. So prior --

1 A. During the whole period of time up through
2 2005, you're saying? Yes.

3 Q. Right.

4 A. Yes, I think this dinner occurred before
5 2005, so I would -- yes.

6 Q. So what did Jeffrey Epstein tell you about
7 his relationship with Bill Clinton?

8 MR. INDYKE: Same objection, same
9 instruction.

10 BY MR. EDWARDS:

11 Q. Prior to 2005, obviously.

12 A. That they knew each other and that they
13 were doing some charitable work together.

14 Q. Had Bill Clinton ever been to Jeffrey
15 Epstein's home?

16 A. I'm not aware.

17 MR. INDYKE: Same objection, same
18 instruction.

19 BY MR. EDWARDS:

20 Q. What kind of charitable work was Jeffrey
21 Epstein --

22 A. I can tell you Donald Trump has been to
23 Jeffrey Epstein's home, and I've seen him there.

24 Q. Okay. What question do you think that
25 you're answering?

1 A. Well, you're asking about general things
2 people --

3 SPECIAL MASTER POZZUOLI: Let's move
4 forward.

5 A. -- so I mean, I gave you an example of one
6 who has been there.

7 BY MR. EDWARDS:

8 Q. Okay. I'm specifically talking about
9 when -- we started with was Virginia lying when she
10 said that Jeffrey Epstein socialized with Bill
11 Clinton during the relevant time period. And now
12 I'm drilling it.

13 A. I don't know the answer to that.

14 Q. Okay. Did you understand -- did Bill
15 Clinton travel with Jeffrey Epstein?

16 A. My understanding from newspaper --

17 MR. INDYKE: Same objection, same
18 instruction.

19 A. My understanding from newspaper accounts
20 is that they went to Africa together with some other
21 famous people, and I think maybe went to Asia
22 together as well. So the answer is yes, I am aware
23 through nonprivileged sources that they traveled
24 together, yes.

25 MR. SCOTT: Can we take a break in a few

1 minutes? I would like -- in the afternoon, he
2 gets a little tired, so I would like to, every
3 hour or so, take -- an hour and ten minutes,
4 take a couple-minute break.

5 SPECIAL MASTER POZZUOLI: You tell me when
6 is a good --

7 MR. EDWARDS: Maybe 15 minutes and we'll
8 switch topics, and we can take a break. Good,
9 Tom?

10 MR. SCOTT: Yes.

11 MR. EDWARDS: Okay.

12 BY MR. EDWARDS:

13 Q. Was Virginia Roberts lying when she says
14 she was introduced to Prince Andrew through Jeffrey
15 Epstein?

16 MR. INDYKE: Same objection, same
17 instruction.

18 SPECIAL MASTER POZZUOLI: Under
19 non-privileged information.

20 A. I have seen a photograph of Prince Andrew
21 and Virginia Roberts and Ghislaine Maxwell. I have
22 myself met Prince Andrew. He came to my class at
23 Harvard Law School and there was a dinner for him,
24 and he asked about Jeffrey Epstein. We discussed
25 Jeffrey Epstein.

1 BY MR. EDWARDS:

2 Q. I don't know if this was -- I believe it
3 was attached to the deposition last time.

4 A. That's the photograph.

5 MR. SCOTT: I think it was.

6 MR. SCAROLA: It was.

7 MR. EDWARDS: I think it was, too.

8 MR. SCOTT: It was.

9 BY MR. EDWARDS:

10 Q. So you're familiar with this photograph?

11 A. Yes, and I'm also familiar there's no
12 comparable photograph with me in it.

13 Q. Okay.

14 MR. SCAROLA: That's not responsive.

15 SPECIAL MASTER POZZUOLI: Move forward.

16 MR. SCAROLA: Move to strike.

17 BY MR. EDWARDS:

18 Q. And in this photograph, this is Prince
19 Andrew over here on the left?

20 A. That's true, yeah.

21 Q. And this is Virginia Roberts in the
22 middle?

23 A. I've never seen -- I've never met
24 Ms. Roberts, never seen her.

25 Q. So are you saying that she is lying when

1 **she says that's her?**

2 A. No, I just don't -- I've never seen her.

3 MR. SCOTT: Objection, argumentative.

4 A. Those are photographs -- I've seen
5 photographs --

6 SPECIAL MASTER POZZUOLI: Hang on one
7 second. Reask -- rephrase the question.

8 BY MR. EDWARDS:

9 Q. And who is this over here on the --

10 SPECIAL MASTER POZZUOLI: No, rephrase the
11 question, the previous question about who the
12 young lady is next to Prince Andrew.

13 BY MR. EDWARDS:

14 Q. Sure. Do you know who this lady is in the
15 middle of this photograph?

16 A. On the basis of newspaper accounts, it is
17 reported that she is Virginia Roberts. I wouldn't
18 be able -- if you had shown me that picture a year
19 and 16 days ago, I would not have been able to tell
20 you that that's Virginia Roberts because I didn't
21 know who she was.

22 Q. And who is the other person that's in this
23 photograph?

24 A. Ghislaine Maxwell.

25 Q. And that's somebody else that you know,

1 correct?

2 A. I do.

3 Q. And you know her through Jeffrey Epstein,
4 right?

5 MR. INDYKE: Same objection, same
6 instruction.

7 A. I wrote an article about her father's
8 death years ago, and I don't remember if I met her
9 independently. I do remember meeting her through
10 her -- I remember that the Lady Rothschild asked me
11 to meet Jeffrey Epstein, and when Jeffrey Epstein
12 came to meet me, he was with Ghislaine Maxwell.

13 BY MR. EDWARDS:

14 Q. And when was that?

15 A. The first time I Jeffrey Epstein, which
16 would have been in the summer of Leslie Wexner's
17 59th birthday. That's all I can tell you is the
18 summer of his 59th birthday because I then flew with
19 Jeffrey Epstein to Leslie Wexner's 59th birthday. I
20 was presented to Leslie Wexner. Leslie would like
21 to get as birthday gifts interesting people that his
22 friends had met during the year, and so I was
23 Jeffrey Epstein's intellectual gift to Leslie
24 Wexner. And it was that year that I met Jeffrey
25 Epstein. That's the best I can date it.

1 Q. Okay. And Ghislaine Maxwell, you are
2 aware, is involved in litigation with Virginia
3 Roberts right now, correct?

4 A. She is being sued by Virginia Roberts for
5 defamation, not for the underlying offenses, which
6 are beyond the statute of limitations, as I
7 understand it, correct.

8 Q. And have you spoken with Ghislaine Maxwell
9 about the allegations against her and her denials?

10 MR. INDYKE: Same objection, same
11 instruction.

12 MR. SCOTT: Don't answer it. It's
13 privileged.

14 BY MR. EDWARDS:

15 Q. I'm asking about your conversations with
16 Ghislaine Maxwell, who's in a separate litigation,
17 civil litigation for defamation. Have you
18 personally spoken with Ghislaine Maxwell since these
19 allegations?

20 A. If there's no objection, I will answer.

21 MR. INDYKE: There was an objection. Same
22 objection, same instruction.

23 BY MR. EDWARDS:

24 Q. Is there a joint defense agreement related
25 to the civil allegation -- actions regarding the

1 defamation actions that involve Ghislaine Maxwell
2 and yourself?

3 MR. INDYKE: Same objection.

4 SPECIAL MASTER POZZUOLI: What's the
5 basis -- can you explain to me what the basis
6 of the objection is -- and what was the
7 question?

8 MR. EDWARDS: Has Mr. Dershowitz spoken
9 with Ghislaine Maxwell since the allegations --
10 since this defamation suit came about as well
11 as the defamation suit with Ghislaine Maxwell.

12 BY MR. EDWARDS:

13 Q. Let me ask it cleaner. Have you spoken
14 with Ghislaine Maxwell since January 2015?

15 MR. INDYKE: Same objection, same
16 instruction.

17 BY MR. EDWARDS:

18 Q. So that I'm clear, there is a joint
19 defense of the allegations regarding Ghislaine
20 Maxwell that's New York litigation and this
21 defamation case?

22 MR. INDYKE: There's a common interest
23 agreement in effect with respect to the
24 New York case and a common interest agreement
25 with respect to this case.

1 BY MR. EDWARDS:

2 Q. Okay. Was Virginia Roberts lying when she
3 says that she was taken by Ghislaine Maxwell and --

4 MR. SCAROLA: Who negotiated the agreement
5 and when?

6 BY MR. EDWARDS:

7 Q. Is there a common interest agreement in
8 existence with respect to the allegations that have
9 arisen since January of 2015 or that you contend
10 covers that?

11 MR. INDYKE: Same objection, same
12 instruction.

13 BY MR. EDWARDS:

14 Q. If there is, who negotiated this
15 agreement?

16 MR. SCAROLA: Can we have a ruling on
17 propriety?

18 SPECIAL MASTER POZZUOLI: You haven't
19 pushed me, so I let you go.

20 MR. SCAROLA: Can we have a ruling as to
21 whether we get to know whether Mr. Dershowitz
22 is a party to a common interest agreement with
23 Ghislaine Maxwell?

24 SPECIAL MASTER POZZUOLI: Counsel --

25 MS. McCAWLEY: Also, just this is Sigrid

1 McCawley, if any of the individuals on the
2 phone are representing Ghislaine Maxwell, my
3 understanding is the person on the phone is
4 representing Jeffrey Epstein, not Ghislaine
5 Maxwell. That needs to be clarified.

6 MR. INDYKE: Correct. Correct.

7 SPECIAL MASTER POZZUOLI: The answer is
8 correct?

9 MR. INDYKE: With respect to Mr. Epstein,
10 I can tell you there's a common interest
11 agreement with respect to this matter and a
12 common interest agreement with respect to the
13 Ghislaine Maxwell suit in New York.

14 SPECIAL MASTER POZZUOLI: Is
15 Mr. Dershowitz party to that?

16 MR. INDYKE: Mr. Dershowitz is party to a
17 common interest agreement with Jeffrey in this
18 case. And I believe -- I'd have to check, but
19 I believe that that would extend --

20 MR. SCAROLA: We want an answer from the
21 witness as to whether the witness is a party to
22 a common interest agreement with Ghislaine
23 Maxwell.

24 SPECIAL MASTER POZZUOLI: Then ask the
25 question, because I haven't seen the question

1 asked yet.

2 BY MR. EDWARDS:

3 **Q. Are you a party to a common interest**
4 **agreement with Ghislaine Maxwell?**

5 A. If there's no objection, I'll answer it.

6 MR. INDYKE: I apologize. I thought we
7 were still operating under the original set of
8 objections. So I will repeat it. Same
9 objection, same instruction.

10 SPECIAL MASTER POZZUOLI: With respect to
11 that question, you can answer.

12 A. My understanding is that I am still
13 Jeffrey Epstein's lawyer. Jeffrey Epstein, I
14 understand, has a common interest or joint defense
15 agreement with Ghislaine Maxwell, so I have -- my
16 understanding is that I am bound by a common
17 agreement.

18 BY MR. EDWARDS:

19 **Q. Is this the same common interest agreement**
20 **that we were talking about from 2005, or is this a**
21 **separate common interest agreement that has been**
22 **signed as a consequence of the lawsuits that have**
23 **been filed since January 2015?**

24 MR. INDYKE: If this is a new question,
25 I'll assert the same objection and the same

1 instruction.

2 SPECIAL MASTER POZZUOLI: And I'm going to
3 overrule the objection. And you can answer
4 that.

5 A. My understanding is that it's a
6 combination; that is, it reflects the previous
7 agreement and that there is a new agreement that
8 supplemented the previous agreement.

9 BY MR. EDWARDS:

10 Q. When you say it's your understanding, is
11 this understanding in writing; meaning, is there a
12 written common interest agreement that has been put
13 in place since January of 2015?

14 A. I don't know.

15 MR. INDYKE: Same objection, same
16 instruction.

17 MR. SCOTT: Can we take a recess when we
18 get a chance?

19 SPECIAL MASTER POZZUOLI: Yes, but I'm
20 going to instruct you --

21 A. I don't know. I don't know the answer to
22 that, whether there's additional writing or not.

23 BY MR. EDWARDS:

24 Q. Last question, then we take a break. Have
25 you signed any such agreement --

1 MR. INDYKE: Same objection, same
2 instruction.

3 BY MR. EDWARDS:

4 **Q. -- since January 2015?**

5 A. Since January? Not to my recollection.

6 MR. EDWARDS: We can take a break.

7 VIDEOGRAPHER: Going off the record. The
8 time is approximately 2:09 p.m.

9 (Recess was held from 2:09 p.m. until 2:26 p.m.)

10 VIDEOGRAPHER: Going back on the record.
11 Time is approximately 2:26 p.m.

12 BY MR. EDWARDS:

13 **Q. Going back to the photograph, was Virginia**
14 **Roberts lying when she says that she was taken to**
15 **London where this photograph was taken?**

16 A. I have no idea.

17 MR. INDYKE: Same objection, same
18 instructions.

19 BY MR. EDWARDS:

20 **Q. Was Virginia Roberts lying when she says**
21 **that she was paid to have sex with Prince Andrew?**

22 MR. INDYKE: Same objection, same
23 instructions.

24 A. Can you tell me what age she was when that
25 happened?

1 BY MR. EDWARDS:

2 Q. The photograph is printed in March of
3 2001, which is when she's 17, which just means that
4 the photograph was taken sometime before that date.
5 So she was at least as young as 17 is the best that
6 I can tell you.

7 A. Under the age of consent, that would be an
8 act of prostitution. If she was paid \$15,000 to
9 have sex with Prince Andrew at the age of 17 in
10 England, she would be guilty of prostitution.

11 Q. My question is, was she lying when she
12 says that she was paid to have sex with Prince
13 Andrew?

14 A. I have no idea.

15 Q. You have met Prince Andrew, right?

16 A. I have.

17 Q. He sat in the back of your classrooms?

18 MR. SCOTT: Objection, asked and answered
19 twice.

20 A. Once, yes.

21 BY MR. EDWARDS:

22 Q. I think we went to Jeffrey Epstein sitting
23 in your classrooms, but now I'm talking about Prince
24 Andrew sat in your classroom as well, right?

25 A. Yes, once.

1 MR. SCOTT: I thought we went through
2 Andrew before; maybe I'm wrong.

3 BY MR. EDWARDS:

4 Q. Have you, since the -- since January of
5 2015, have you contacted Prince Andrew?

6 A. No. I got a Christmas card from him.

7 Q. Have you spoke with him about the
8 allegations that were alleged against Prince Andrew?

9 A. Not to him, but to -- not to him.

10 Q. Have you spoke to some representative of
11 his, of Prince Andrew?

12 A. I need to know whether --

13 MR. INDYKE: Guy, sorry, I was just cut
14 off for some reason.

15 SPECIAL MASTER POZZUOLI: Hold on a
16 second. Go ahead and restate your question
17 so -- Darren, can you hear now?

18 MR. INDYKE: Yes, I can.

19 BY MR. EDWARDS:

20 Q. My question is, have you spoken with
21 Prince Andrew or any representative of or for Prince
22 Andrew since January of 2015?

23 MR. SCOTT: If any of that involved work
24 product on our part, I am instructing you not
25 to answer.